

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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MEMORANDUM

January 16, 1984

TO: Bruce Johnson
FROM: Tim L. Nord
SUBJECT: WAC 173-303 Compliance Inspection at Scott Paper Company
WAD 009250820

This memorandum and attached information documents a WAC 173-303 compliance inspection conducted at Scott Paper on January 6, 1984. I acted as department representative and met with Tim Bechtel and Sam Archer of Scott. The last compliance inspection conducted at this facility occurred on November 17, 1982.

Scott Paper, on December 5 1983, withdrew their Part A Permit Application which allowed them to store dangerous wastes on the plant site. The department officially withdrew this application on December 19, 1983 based on the understanding that Scott will no longer store dangerous waste over 90 days. Scott, however, will maintain generator status.

Listed in Table 1 are the wastes this facility is capable of generating. Also included are the estimated annual quantities, handling methods, and waste designations.

Table 1

<u>Waste</u>	<u>DW #</u>	<u>Quantity</u>	<u>Designation</u>	<u>Handling Procedure</u>
Mercuric Chloride	U151	185 lbs.	EHW	Arlington
Trichloroethylene	U228	2,700 lbs.	EHW	Recycle if a waste
Solvent	F001	1,600 lbs.	DW	Recycle
Solvents	F003	5,000 lbs.	DW	Recycle
Solvents	F005	12,000 lbs.	DW	Recycle
Resin Sludge	WT01	4,800 lbs.	EHW	Recycle or Arlington

Scott's 1982 annual report stated that the facility generated only one waste during that year (laboratory test solutions). However, in review, I have determined that the reported waste was actually comprised of two waste streams, mercuric chloride and lab test solutions respectively. Scott, further did not report the waste solvents (F003, F005) which they currently burn in their hogged fuel boiler and that which is recycled by Safety Kleen (F001). (See WAC 173-303-120.) I discussed the above with Mr. Bechtel and Scott will now include them in their annual report.

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Bruce Johnson
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During the summer of 1983 EPA and Labor and Industries conducted an investigation at the mill regarding alleged burning of PCBs in the plant's hogged fuel boiler. Evidently Scott personnel had mistakenly pumped waste solvents (FOO3, F005) into their waste oil tank which feeds to their hogged fuel boiler (standard procedure is to have separate waste streams going to the boiler). An employee took a sample of this solvent/oil mixture and had it sent (via union personnel) to the L & I laboratory for analysis. The results of which indicated the mixture contained between 50-75 ppm PCBs.

The following investigation by the above agencies determined that the solvent/oil mixture in the tank, in fact, did not contain PCBs. How the original sample got to contain PCBs is unknown. Of importance here is that this investigation was conducted without the knowledge of this office. Both Scott and EPA should have notified us of the situation. I stated to Mr. (b) (6) that in the future we must be informed when investigations of this nature take place.

Attached to this memorandum is a compliance checklist which further documents this inspection.

TLN:bjw

Attachment

cc: Dick Burkhalter, DOE
Tom Cook, DOE
George Hofer, EPA
Chuck Rice, EPA
(b) (6), Scott Paper